

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION

UNITED STATES OF AMERICA,)	No. _____
)	
Plaintiff,)	COUNT ONE:
)	Attempted Kidnaping of a Minor
v.)	18 U.S.C. § 1201(a)
)	NLT: 20 Years Imprisonment
JEFFREY S. THOMAS,)	NMT: 20 Years Imprisonment
a/k/a "eeinnavy,")	NMT: \$250,000 Fine
[DOB: XX/XX/1968])	Class C Felony
)	
Defendant.)	COUNT TWO:
)	Use of an Interstate Facility
)	to Entice a Minor
)	to Engage in Sexual Activity
)	18 U.S.C. § 2422(b)
)	NLT: 5 Years Imprisonment
)	NMT: 30 Years Imprisonment
)	NMT: \$250,000 Fine
)	Supervised Release: Any Term of Years or Life
)	Class B Felony
)	
)	COUNT THREE:
)	Interstate Travel
)	to Engage in Sexual Act With a Minor
)	18 U.S.C. § 2423(b)
)	NMT: 30 Years Imprisonment
)	NMT: \$250,000 Fine
)	Supervised Release: Any Term of Years or Life
)	Class B Felony
)	
)	COUNT FOUR:
)	[Forfeiture]
)	
)	\$100 Special Assessment
)	(Each Count, Except Count Four)
)	
)	Maximum Punishment if Convicted

) on All Counts:
)
) 80 Years Imprisonment
) \$750,000 Fine
) Any Term of Years or Life
) \$300 Special Assessment

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about September 4, 2003, to and including April 16, 2005, in the Western District of Missouri and elsewhere, **JEFFREY S. THOMAS**, defendant herein, unlawfully attempted to inveigle and decoy a female who had not attained the age of 18 years through false statements and deceit to willfully transport her in interstate commerce from Missouri to Pennsylvania for the purpose of engaging in illicit sexual conduct; all in violation of Title 18, United States Code, Section 1201(a). ____

COUNT TWO

On or about September 4, 2003, to and including April 15, 2005, in the Western District of Missouri and elsewhere, **JEFFREY S. THOMAS**, defendant herein, knowingly used a facility of interstate commerce to persuade, induce, and entice an individual who had not attained the age of 18 years to engage in sexual activity for which the defendant could be charged with a criminal offense, that is, the following felonies proscribed by the statutes of the State of Missouri: statutory rape in the second degree

(Mo. St. 566.034); and statutory sodomy in the second degree (Mo. St. 566.064); all in violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

On or about April 14, 2005, to and including April 15, 2005, in the Western District of Missouri and elsewhere, **JEFFREY S. THOMAS**, defendant herein, knowingly traveled in interstate commerce for the purpose of engaging in illicit sexual conduct with another person; in violation of Title 18, United States Code, Section 2423(b).

COUNT FOUR

The allegations contained in Count Three are realleged and are incorporated by reference herein for the purpose of alleging forfeiture of: any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses; including, but not limited to a 1994 Model Blue Chevrolet Blazer, Pennsylvania License Plate #FTR1394, VIN # 1GNCT1828R0113289; all in violation of Title 18, United States Code, Section 2253.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

Cynthia L. Phillips
Assistant United States Attorney

Date: _____
Kansas City, Missouri